

# EXHIBIT A

# Vinson&Elkins

Joseph Gray jgray@velaw.com  
Tel 512.542.8420 Fax 512.236.3224

July 5, 2006

Case 6:06-cv-00082-LJD-JDL Document 75 Filed 11/13/2006 Page 2 of 2

Re: Mr. Lemieux, Esq.  
Paul, Hastings, Janofsky & Walker LLP  
Five Palo Alto Square  
Sixth Floor  
Palo Alto, CA 94306-2155

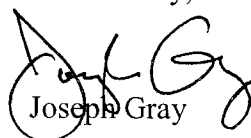
Re: *AdvanceMe, Inc. v. RapidPay LLC et al.* (No. 6:05-cv-424) (E.D. Tex.)  
*AdvanceMe, Inc. v. Amerimerchant LLC* (No. 6:06-cv-82) (E.D. Tex.)

Dear Mr. Lemieux:

We write regarding documents relevant to the above-referenced cases that AdvanceMe, Inc. ("AdvanceMe") has not produced as of July 5, 2006. As you know, June 26, 2006 was the deadline for initial production of documents in the *RapidPay* action, which should have included production of all documents relevant to this action. As Bill Schuurman mentioned during Barbara Johnson's deposition last week, we have become aware of documents that are relevant to the issues in the above-referenced cases that have not been produced. For example, Gary Johnson and Les Falk were deposed in *Angrisani v. Capital Access Network, Inc.* (No. 2:02-cv-3167) (D.N.J.), and issues relevant to the above-referenced cases were discussed. These deposition transcripts, in their entirety, are highly relevant to the issues in the instant cases and should be immediately produced.

Additionally, AdvanceMe has not produced ANY documents that are not publicly available. Please advise whether it is AdvanceMe's position that it has absolutely no relevant documents in its possession, custody or control other than those which were produced on June 26, 2006, including but not limited to memoranda, reports, minutes or email regarding any issue in this action, including but not limited to conception, inventorship, reduction to practice, prosecution and/or enforcement of U.S. Patent No. 6,826,544 and/or U.S. Patent No. 6,941,281.

Yours Truly,

  
Joseph Gray